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**HANSKI PARTNERS LLC**  
85 DELANCEY STREET  
NEW YORK, NY 10002

**MEMO ENDORSED**

May 29, 2025

Via ECF

The Honorable Barbara Moses  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street,  
New York, NY 10007

Re: *Joint Request to Adjourn Initial Pretrial Conference*  
*Bueno v. Kuhlman et al; 1:25-cv-00730*

Application GRANTED. The status conference previously scheduled for June 5, 2025 is hereby ADJOURNED to **July 9, 2025 at 11:00 a.m.** The parties' joint pre-conference statement is due no later than **July 2, 2025**. SO ORDERED.



Barbara Moses  
United States Magistrate Judge  
May 30, 2025

Dear Judge Moses:

We represent Plaintiff Oliver Bueno in the above-referenced action. We write on behalf of Plaintiff and defendant Jay D. Kuhlman, DVM<sup>1</sup> (together the “Parties”) to respectfully ask the Court to adjourn the Initial Pretrial Conference set for June 5, 2025 to a date on or after July 7, 2025, with the Parties’ deadline to file a joint Pre-Conference Statement extended to the date that is 7 days before the adjourned conference. As required by the Court’s Individual Rules, the Parties advise that they are available to appear for an adjourned conference on July 10, 2025 and July 17, 2025, or on a date that is convenient for the Court.

The Parties make this request as they are engaged in settlement discussions and, based on the proposed settlement parameters, are optimistic that they can reach a settlement in principle of this action within the next 2 weeks. If so, an Initial Pretrial Conference for the purposes of setting a discovery plan for the case will prove unnecessary in this matter. The Parties therefore make this adjournment request to avoid further burdening the Court and the Parties’ resources with a conference.

All Parties to this action join in this first request for an adjournment of the Initial Pretrial Conference and the Pre-Conference Statement. The requested adjournment will not affect any other dates in this action. The Parties are mindful that their joint Pre-Conference Statement is due today, May 29, 2025, and respectfully ask the Court to permit them to file their joint submission the day after the Court rules on this request should the Court decline to adjourn the Initial Pretrial Conference.

Given the foregoing, the Parties respectfully ask the Court to adjourn the Initial Pretrial Conference set for June 5, 2025 to a date on or after July 7, 2025, with the Parties’ deadline to file a joint Pre-Conference Statement extended to the date that is 7 days prior.

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<sup>1</sup> Defendant Jay D. Kuhlman, an individual, is named as a defendant in this action as the individual who owns the building within which Gramercy Park Animal Hospital is located, and as the operator of the veterinary practice d/b/a Gramercy Park Animal Hospital.

All Parties thank the Court for its time and attention to this matter.

Respectfully,

/s Adam S Hanski

Adam S. Hanski